1 Russell E. Marsh, Esquire Nevada Bar No. 11198 2 Sunethra Muralidhara, Esquire Nevada Bar No. 13549 3 Wright Marsh & Levy 300 S. Fourth Street, Suite 701 4 Las Vegas, NV 89101 5 Phone: (702) 382-4004 Fax: (702) 382-4800 6 Email: russ@wmllawlv.com smuralidhara@wmllawlv.com 7 8 Attorneys for Jared Edward Jaurequi 9 United States District Court 10 District of Nevada 11 UNITED STATES OF AMERICA, 12 Plaintiff, 13 v. 14 JARED EDWARD JAUREQUI, 15 Defendant. 16 17 Defendant, Jared Edward Jaurequi respectfully asks this Honorable Court to appoint 18 19 20 21 22 23 24 25 26

Case No. 2:22-CR-00030-RFB-DJA-05

Defendant Jared Edward Jaurequi's Motion to Appoint Co-Counsel And Proposed Order

Sunethra Muralidhara as co-counsel for him nunc pro tunc.¹ Currently, Russell E. Marsh is appointed CJA counsel for Mr. Jaurequi. The nature and complexity of this case and the looming trial date are such that the interests of justice require the appointment of co-counsel. Ms. Muralidhara is well suited to serve that role. Consistent with Nevada's CJA Plan and General Order 2021-01, defense counsel has obtained the required approval of the CJA

¹ The Nunc Pro Tunc date is January 12, 2024, the date the request for co-counsel was sent to the CJA unit for approval.

Standing Committee and CJA Resource Counsel.² Accordingly, counsel submits the instant motion.

This motion is made and based upon Guide to Judiciary Policies and Procedures, Vol 7, Ch 2§ 230.53.20(b), the Memorandum of Points and Authorities hereinbelow, pleadings and papers on file herein, and any argument the Court may entertain.

Memorandum of Points and Authorities

This is a multi-defendant copyright infringement case wherein the government asserts that defendants were part of a conspiracy to reproduce tens of thousands of copyrighted television episodes without the permission of the copyright owners. The Government alleges that the copyright owners and licensed streaming services suffered millions of dollars in damages. ECF 1

This case is currently set to go to trial March 11, 2024, with an expected duration of three to four weeks. It is presumed that the Government will be represented at trial by three attorneys and their attendant support staff. Others of the defendants have the benefit of more than one counsel. *See* ECF 125. Mr. Jaurequi seeks equity in also being afforded the benefit of two defense attorneys at trial given the complexity and nature of this case and the approaching trial date.

The defense's preferred co-counsel is Sunethra Muralidhara, a current defense attorney who also practices at Wright Marsh & Levy, the law firm where Mr. Marsh is managing partner. She is a member of the CJA panel and has been so since 2018. Ms. Muralidhara is a former Assistant Federal Public Defender and has been practicing law for nearly a decade (since November of 2014). She has represented numerous criminal defendants charged in federal court. She is capable and well qualified to assume co-counsel duties as she currently practices criminal law exclusively with a focus on federal criminal defense and represents both private

² On January 16, 2024, undersigned counsel received an email from the CJA unit advising of Ms. Muralidhara's approval by the Chair of the CJA Standing Committee to serve as associate counsel.

and indigent clients on her own. Ms. Muralidhara has also worked on litigation teams with both Richard Wright and Russell Marsh on federal criminal cases in this jurisdiction. Richard Wright is founder of Wright Marsh & Levy, and long-standing member of the CJA panel and along with Mr. Marsh, a well-known and highly respected criminal defense attorney in the Las Vegas community. Additionally, appointing Ms. Muralidhara as co-counsel will afford her the opportunity to continue to gain valuable trial experience. Ms. Muralidhara is knowledgeable about the facts and circumstances surrounding this case and has been involved in trial preparation and consultation with the client.

For all these reasons, the defense requests this Court issue an Order appointing Ms. Muralidhara as co-counsel for Mr. Jaurequi at the maximum CJA compensation rate and nunc pro tunc to January 12, 2024.

DATED January 19, 2024.

WRIGHT MARSH & LEVY

By: /s/ Russell E. Marsh
Russell E. Marsh
Attorney for Mr. Jaurequi

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of January, 2024, I caused a copy of the foregoing Defendant Jared Jaurequi's Motion to Appoint Co-counsel and Proposed Order to be served via the Court's CM/ECF electronic filing system addressed to all parties on the eservice list, emailed, hand delivered, facsimile or placed in the United States mail, postage prepaid as necessary.

/s/ Debbie Caroselli

An employee of Wright Marsh & Levy

United States District Court District of Nevada

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 2:22-CR-00030-RFB-DJA-05

[Proposed] Order

v.

JARED EDWARD JAUREQUI,

Defendant.

Counsel for defendant Jaurequi has moved for an order appointing co-counsel in this case for the purposes of trial and trial preparation. The motion seeking appointment of co-counsel explains the nature of the case, the difficulties it presents, and how, as a result, appointing co-counsel is necessary in the interests of justice. Proposed co-counsel Sunethra Muralidhara, is an attorney at the firm Wright Marsh & Levy, the same firm where counsel Russell E. Marsh serves as managing partner. She is also a member of the CJA panel and already familiar with this case. She is an experienced attorney capable of serving as co-counsel.

As required by Volume 7, Ch 2 § 230.53.20 of the Guide to Judicial Policies and Procedures, the Court finds that the appointment of an additional attorney in this difficult case is necessary and in the interest of justice.

Good cause appearing, it is hereby ordered that the Clerk of the Court shall notify the CJA appointing authority for the District of Nevada of the appointment of Sunethra Muralidhara as co-counsel for defendant Jaurequi, and that she be compensated at the maximum allowable CJA rate. **This Order is nunc pro tunc to January 12, 2024.**

Dated January 22, 2024.

RICHARD F. BOULWARE, II UNITED STATES DISTRICT JUDGE